

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WOOLERY & CO., PLLC,	:	
	:	
Plaintiff,	:	
	:	Case No.: 1:25-cv-00985-MKV
-against-	:	
	:	
4M INVESTMENTS, LLC and TED B.	:	
MILLER, JR.,	:	
	:	
Defendants.	:	
-----X	:	

**NOTICE OF MOTION TO DISMISS
PLAINTIFF’S AMENDED VERIFIED COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Ted B. Miller, Jr., in Support of the Motion to Dismiss Plaintiff’s Amended Verified Complaint, dated April 7, 2025, the accompanying Declaration of Patrick T. Campbell, Esq., in Support of the Motion to Dismiss Plaintiff’s Amended Verified Complaint, dated April 7, 2025, and the accompanying Memorandum of Law submitted herewith and all of the papers and proceedings heretofore had herein, Defendants 4M Investments, LLC, and Ted B. Miller, Jr., by their attorneys, Baker & Hostetler LLP, will and do hereby respectfully move this Court before the Honorable Mary Kay Vyskocil, United States District Judge at the United States District Court for the New York Southern District, 40 Foley Square, New York, New York 10007, at a date and time to be set by the Court for an Order pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(3), and 12b(6) granting Defendants’ motion in its entirety and such other and further relief as this Court may deem just and proper.

Dated: April 7, 2025
New York, New York

BAKER & HOSTETLER LLP

By: /s/ Patrick T. Campbell
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*Attorneys for Defendants 4M
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